

Rich

Nick

ent, Franklin S.

B. That the visual depictions were in the form of data stored on computer disk and other electronic means that was capable of being converted into visual images.

C. That the visual depictions were transported and shipped via computer and the Internet.

D. That the sexually explicit conduct transported and shipped depicted the following:

Image	Description
India_blow. Jpg	A partially nude minor female wearing a sock and a necklace while an adult male's penis is inserted in her mouth.
underage sex.jpg	A nude minor female engaged in sexual intercourse with an adult male.
11 _sucks .jpg	A nude minor female sitting on a bed with an adult male's penis inserted in her mouth.
Cristie+fuck+2-7- 03.jpg	A nude minor female lying on a bed engaged in lascivious exhibition of the genitals while an adult male masturbates above her.

The Government would further be prepared to prove as follows:

A. The material involved a prepubescent minor and a minor under the age of twelve years.

B. The offense involved distribution to a minor.

C. The offense involved distribution to a minor that was intended to persuade, induce, entice, coerce, or facilitate the travel of, a minor to engage in prohibited sexual conduct.

D. The offense involved distribution.

E. The offense involved material that portrays sadistic and masochistic conduct and other depictions of violence.

F. A computer was used for the transmission or distribution of the material.

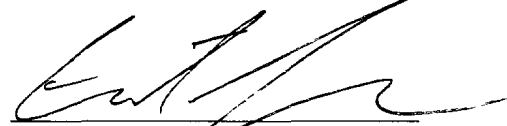
A violation of Title 18, United States Code, Section 2252(a)(1).

The government is not in possession of any evidence, or aware of any evidence, which indicates that Defendant's conduct was for pecuniary gain.

The government was prepared to prove the foregoing by physical evidence, forensic computer analysis, the Defendant(s) own admissions, and testimony of persons with knowledge of the foregoing events.

JOHNNY K. SUTTON  
UNITED STATES ATTORNEY

By:

A handwritten signature in black ink, appearing to read "Grant Sparks", written over a horizontal line.

GRANT SPARKS  
Special Assistant United States Attorney